# ST JOSEPH'S COLLEGE GEELONG POLICY 1.3 PRIVACY

#### INTRODUCTION

# **Background**

- 1. St Joseph's College Geelong is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice. EREA have a published Privacy Policy and Guidelines that directs all EREA schools and member entities to have a Privacy Policy that conforms with the thirteen Australian Privacy Principles found in the Privacy Act 1988 (Cth) and with the Privacy Amendment (Notifiable Data Breaches) Act 2017(Cth). This is available through our website.
- 2. This Privacy Policy sets out how the College complies with that direction and manages personal information provided to or collected by it.
- 3. The College is bound by the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988. In relation to health records, the College is also bound by the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that Act.
- 4. The College may, from time to time, review and update this Privacy Policy to take account of new laws and technology, changes to the College's operations and practices and to make sure it remains appropriate to the changing school environment.

### INFORMATION COLLECTION

# **Guiding Principles**

- 5. The College collects and holds personal information, including health and other sensitive information, about:
  - a. **students and parents and/or guardians** ('Parents') before, during and after the course of a student's enrolment at the College including:
    - (1) name, contact details (including next of kin), date of birth, gender, language background, previous school and religion;
    - (2) Parents' education, occupation and language background;
    - (3) medical information (e.g. details of disability and/or allergies, and details of any assistance the student receives in relation to those disabilities, medical reports, names of doctors);
    - (4) conduct and complaint records, or other behaviour notes, school attendance and school reports;
    - (5) information about referrals to government welfare agencies;
    - (6) counselling reports;
    - (7) health fund details and Medicare number;
    - (8) any court orders;
    - (9) volunteering information (including Working With Children Checks); AND
    - (10) photos and videos at school events.
  - b. **job applicants, staff members, volunteers and contractors**, including:
    - (1) name, contact details (including next of kin), date of birth and religion
    - (2) information on job application
    - (3) professional development history
    - (4) salary and payment information, including superannuation details

- (5) medical information (eg details of disability and/or allergies and medical certificates)
- (6) complaint records and investigation reports
- (7) leave details
- (8) photos and videos at school events
- (9) workplace surveillance information
- (10) work emails and private emails (when using work email address) and internet browsing history
- c. other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.

### Collection

- 6. **Personal Information you provide**: The College will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students (such as job applicants and contractors) provide personal information to the College.
- 7. **Personal Information provided by other people**: In some circumstances the College may be provided with personal information about an individual from a third party, for example a report provided by a medical professional or a reference from another school. The type of information the College may collect from another school may include:
  - a. academic records and/or achievement levels
  - b. information that may be relevant to assisting the new school meet the needs of the student including any adjustments
- 8. **Exception in relation to employee records**: Under the Privacy Act, the Australian Privacy Principles do not apply to an employee record. As a result, this Privacy Policy does not apply to the College's treatment of an employee record where the treatment is directly related to a current or former employment relationship between the College and employee. The College handles staff health records in accordance with the Health Privacy Principles in the *Health Records Act 2001 (Vic.)*.
- 9. **Anonymity**: The College needs to be able to identify individuals with whom it interacts and to collect identifiable information about them to facilitate the delivery of schooling to its students and its educational and support services, conduct the job application process and fulfil other obligations and processes. However, in some limited circumstances some activities and interactions with the College may be done anonymously where practicable, which may include making an inquiry, complaint or providing feedback.
- 10. **Collection Notices**. The College will advise the school community of the reason for, use of and implications of not providing information on key websites and documents where it is necessary for information to be collected. These collection notices are enclosure 1 and describe:
  - a. General Collection Notice,
  - b. Enrolment Collection Notice,
  - c. Volunteers and Contractors,
  - d. Job Applicants,
  - e. Alumni and Support Associations, and
  - f. Website.

### **USE OF PERSONAL INFORMATION PROVIDED**

11. The College will use personal information it collects from you for the primary purpose of collection, and for such other secondary purposes that are related to the primary purpose of collection and reasonably expected by you, or to which you have consented.

### **Students and Parents**

- 12. In relation to personal information of students and Parents, the College's primary purpose of collection is to enable the College to provide schooling to students enrolled at the College (including educational and support services for the student), exercise its duty of care and perform necessary associated administrative activities which will enable students to take part in all the activities of the College. This includes satisfying the needs of Parents, the needs of the student and the needs of the College throughout the whole period the student is enrolled at the College. The purposes for which the College uses personal information of students and Parents include:
  - a. to keep Parents informed about matters related to their child's schooling, through correspondence, newsletters and magazines;
  - b. day-to-day administration of the College;
  - c. looking after students' educational, social and medical wellbeing;
  - d. seeking donations and marketing for the College;
  - e. to satisfy the College's legal obligations and allow the College to discharge its duty of care; and
  - f. to satisfy the College service providers' legal obligations, including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices and Edmund Rice Education Australia (EREA).
- 13. In some cases where the College requests personal information about a student or Parent, if the information requested is not provided, the College may not be able to enrol or continue the enrolment of the student or permit the student to take part in a particular activity.

### **Job Applicants and Contractors**

- 14. In relation to personal information of job applicants and contractors, the College's primary purpose of collection is to assess and (if successful) to engage the applicant, or contractor, as the case may be.
- 15. The purposes for which the College uses personal information of job applicants and contractors include:
  - a. administering the individual's employment or contract, as the case may be;
  - b. for insurance purposes;
  - c. seeking donations and marketing for the College; and
  - d. satisfying the College's legal obligations, for example, in relation to child protection legislation.

# Volunteers

16. The College also obtains personal information about volunteers who assist the College in its functions or conduct associated activities, such as Old Collegians Association, to enable the College and the volunteers to work together, to confirm their suitability and to manage their visits.

### Counsellors

17. The College contracts with external providers to provide counselling services for some students. The principal may require the Counsellor to inform him or her or other teachers of any issues the principal and the Counsellor believe may be necessary for the College to know for the well-being or development of the student who is counselled or other students at the College.

# **Parish**

18. The College may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.

## Marketing and fundraising

- 19. The College treats marketing and seeking donations for the future growth and development of the College as an important part of ensuring that the College continues to provide a quality learning environment in which both students and staff thrive. Personal information held by the College may be disclosed to organisations that assist in the College's fundraising, for example, the College's Foundation or alumni organisation [or, on occasions, external fundraising organisations].
- 20. Parents, staff, contractors and other members of the wider College community may from time to time receive fundraising information. College publications, like newsletters and magazines, which include personal information and sometimes people's images, may be used for marketing purposes.

### **DISCLOSING INFORMATION**

- 21. The College may disclose personal information, including sensitive information, held about an individual for educational, administrative and support purposes. This may include to:
  - a. College service providers which provide educational, support and health services to the College, (either at the College or off campus) including the Catholic Education Commission of Victoria Ltd (CECV), Catholic Education Offices, EREA, specialist visiting teachers, volunteers, counsellors, sports coaches and providers of learning and assessment tools.
  - b. Third party service providers that provide online educational and assessment support services, document and data management services, training and support services, hosting services, and software-as-a-services applications.
  - c. CECV, Catholic Education offices and EREA Australia to discharge its responsibilities under the *Australian Education Regulation 2013* (Regulation) and the *Australian Education Act 2013* (Cth) (AE Act) relating to students with a disability.
  - d. Other third parties which the College uses to support or enhance the educational or pastoral care services for its students or to facilitate communications with Parents.
  - e. Another College including to its teachers to facilitate the transfer of a student.
  - f. Federal and State government departments and agencies.
  - g. Health service providers.
  - h. Recipients of College publications, such as newsletters and magazines.
  - i. Student's parents or guardians and their emergency contacts.
  - j. Assessment and educational authorities including the Australian Curriculum, Assessment and Reporting Authority.
  - k. Anyone to whom you authorise the College to disclose information.
  - I. Anyone who we are required or authorised to disclose the information to by law, including child protection laws.

### NATIONALLY CONSISTENT COLLECTION OF DATA

22. The College is required by the Federal *Australian Education Regulation* (2013) and *Australian Education Act 2013* (Cth) (AE Act) to collect and disclose certain information under the *Nationally Consistent Collection of Data* (NCCD) on students with a disability. The College provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0

### SENDING AND STORING INFORMATION OVERSEAS

- The College may disclose personal information about an individual to overseas recipients. for instance, to facilitate a school exchange. However, the College will not send personal information about an individual outside Australia without:
  - obtaining the consent of the individual; or
  - otherwise complying with the Australian Privacy Principles or other applicable b. privacy legislation.
- The College may from time to time use the services of third party online service providers (including for the delivery of services and third party online applications, or Apps relating to email, instant messaging and education and assessment, such as Google's G Suite, including Gmail) which may be accessible by you. Some personal information [including sensitive information] may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.
- College personnel and the College's service providers, and the CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the system and services ensuring their proper use.
- The College makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia, in connection with any cloud and third party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the APPs.
- The countries in which the servers of cloud service providers and other third party service providers are located may include Australia and Singapore.
- Where personal and sensitive information is retained by a cloud service provider on behalf of CECV to facilitate Human Resources and staff administrative support, this information may be stored on servers located in or outside Australia.

### MANAGEMENT OF INFORMATION

### Sensitive information

- In referring to 'sensitive information', the College means: information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, philosophical beliefs, sexual orientation or practices or criminal record, that is also personal information; health information and biometric information about an individual.
- Sensitive information will be used and disclosed only for the purpose for which it was 30. provided or a directly related secondary purpose, unless you agree otherwise, or the use or disclosure of the sensitive information is allowed by law.

### **Management and Security of Personal Information**

- The College's staff are required to respect the confidentiality of students' and Parents' personal information and the privacy of individuals.
- The College has in place steps to protect the personal information the College holds from misuse, interference and loss, unauthorised access, modification or disclosure by use of various methods including locked storage of paper records and password access rights to computerised records. This includes responding to any incidents which may affect the security of the personal information it holds. If we assess that anyone whose information is affected by such a breach is likely to suffer serious harm as a result, we will notify them and the Office of the Australian Information Commissioner of the breach.
- It is recommended that parents and the College community adopt secure practices to protect themselves. You should ensure that all passwords you use are strong and regularly updated and that your log in details are kept secure. Do not share your personal information with

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025

anyone without first verifying their identity and organisation. If you believe any of your personal information has been compromised, please let the College know immediately.

### **Access and Correction of Personal Information**

- 34. Under the Privacy Act and the Health Records Act, an individual has the right to seek and obtain access to any personal information and health records respectively which the College holds about them and to advise the College of any perceived inaccuracy. Students will generally be able to access and update their personal information through their Parents, but older students may seek access and correction themselves.
- 35. There are some exceptions to the access rights set out in the applicable legislation.
- 36. To make a request to access or to update any personal information the College holds about you or your child, please contact the College Principal or College Privacy Officer by telephone or in writing. The College may require you to verify your identity and specify what information you require. The College may charge a fee to cover the cost of verifying your application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, the College will advise the likely cost in advance. If we cannot provide you with access to that information, we will provide you with written notice explaining the reasons for refusal.
- 37. There may be circumstances where the reason for refusal is not provided, if doing so may breach the privacy of another person.

# Consent and Rights Of Access To The Personal Information Of Students

- 38. The College respects every Parent's right to make decisions concerning their child's education.
- 39. Generally, the College will refer any requests for consent and notices in relation to the personal information of a student to the student's Parents. The College will treat consent given by Parents as consent given on behalf of the student, and notice to Parents will act as notice given to the student.
- 40. Parents may seek access to personal information held by the College about them or their child by contacting the College Principal or College Privacy Officer by telephone or in writing. However, there may be occasions when access is denied. Such occasions would include where release of the information would have an unreasonable impact on the privacy of others, or where the release may result in a breach of the College's duty of care to the student.
- 41. The College may, at its discretion, on the request of a student grant that student access to information held by the College about them, or allow a student to give or withhold consent to the use of their personal information, independently of their Parents. This would normally be done only when the maturity of the student and/or the student's personal circumstances warrant it.

### **ENQUIRIES AND COMPLAINTS**

- 42. Our Privacy Officer is the first point of contact for advice on privacy matters related to the College. The Privacy Officer is responsible for:
  - a. promoting a culture where the personal information of individuals is protected in accordance with our obligations under the Privacy Act;
  - b. integrating privacy obligations into existing practices and procedures and policy documents;
  - c. ensuring that all relevant persons at the College receive privacy training;
  - d. managing privacy queries and complaints;
  - e. notifying the EREA Privacy Officer of any data breaches at the College;
  - f. in association with the EREA Privacy Officer and the Data Breach Response Team, managing and assessing, and coordinating responses to, data breaches;
  - g. liaising with regulators (where necessary);

- h. monitoring privacy compliance performance;
- i. analysing performance to identify the need for corrective action;
- j. ensuring privacy issues are factored into contracts with external suppliers;
- k. ensuring our Privacy Program is reviewed on a regular basis; and
- I. ensuring Personal Information Audits are conducted on a regular basis to determine how the College collects, uses and discloses personal information.
- 43. If you would like further information about the way the College manages the personal information it holds about you, or wish to complain that you believe that the College has breached its privacy obligations, please contact the College Privacy Officer:

Andrew Dowd, Business Manager privacyofficer@sjc.vic.edu.au Tel: 03 5226 8100

- 44. The College will investigate your complaint and will notify you of the making of a decision in relation to your complaint as soon as is practicable after it has been made.
- 45. If you are not satisfied with the College's decision you may make a complaint to the Office of the Australian Information Commissioner (OAIC) whose contact details are:

GPO Box 5218, Sydney, NSW 2001 Telephone: 1300 363 992 www.oaic.gov.au

### CONCLUSION

- 46. The College's management of personal information provided to or collected by it meet the Australian Privacy Principles (APPs) contained in the Commonwealth Privacy Act 1988. In relation to health records, the College is also bound by the Health Records Act 2001 (Vic.) and the Health Privacy Principles in that Act.
- 47. The College expects that all employees, contractors, volunteers, associations will abide by this policy and all related policies.

## **Consequences of Breaching this Policy**

48. Non-compliance with this policy may be grounds for disciplinary action. Depending on the seriousness of the circumstances, disciplinary action can be up to and including termination of employment.

### **Related Policies**

- 49. SJC Policy 1.3 Privacy has linkages to other relevant College policies and professional expectations, as follows:
  - a. EREA Privacy Policy, and
  - b. EREA Code of Conduct.

### **Policy Review**

50. The custodian of this Policy is the Privacy Officer. It will be reviewed every three years to take account of any changed technology, legislation, expectations or practices.

### **Authority**

51. This policy has been authorised by the St Joseph's College Principal.

# **Enclosures:**

1. Collection Notices

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0

### **COLLECTION NOTICES**

### General Collection Notice

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- 1. The College collects and holds personal information, including health and other sensitive information, about:
  - a. students and parents and/or guardians ('Parents') before, during and after the course of a student's enrolment at the College;
  - b. job applicants, staff members, volunteers and contractors; and
  - c. other people who come into contact with the College, including name and contact details and any other information necessary for the particular contact with the College.
- 2. The College will generally collect personal information held about an individual by way of forms filled out by Parents or students, face-to-face meetings and interviews, emails and telephone calls. On occasions people other than Parents and students (such as job applicants, contractors and the wider community) provide personal information to the College.
- 3. St Joseph's College collects personal information, including sensitive information from all parties before and during the course of their interaction with the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to potentially facilitate and administer the involvement with the College.
- 4. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care to enrolled students.
- 5. Laws governing or relating to the operation of a College require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
- 6. In order to manage your relationship with College, you consent to our collecting personal information about you from recruitment agencies, law enforcement agencies for criminal checks and working with children checks, educational institutions to verify your qualifications, and other individuals or businesses we contact for the purpose of reference-checking as agreed with you.
- 7. The personal information we collect about you will be stored securely. If you become a volunteer/contractor then an appropriate record will be created and the personal information we have collected about you will be stored in this file. We will hold this information for the agreed period of the contract or duration of the volunteer work.
- 8. The College may disclose personal and sensitive information for administrative, educational and support purposes (or may permit the information to be directly collected by third parties). This may include to:
  - a. government departments;
  - b. third party service providers that provide online educational and assessment support services or applications (apps), which may include email and instant messaging;
  - c. medical practitioners, and people providing educational support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
  - d. people providing administrative and financial services to the College;
  - e. anyone you authorise the College to disclose information to; and
  - f. anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
- 9. The College may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia. The EREA's Privacy Policy the College's Privacy Policy contains further information about its use of cloud and other third-party service providers and any of their overseas locations.
- 10. The EREA Privacy Policy and the College's Privacy Policy is accessible via the College website or from the College office. The policy sets out how you may seek access to, and correction of personal information which the College has collected and holds. However, access may be refused in certain

circumstances such as where access would have an unreasonable impact on the privacy of others, or may result in a breach of the College's duty of care obligations. Any refusal will be notified in writing with reasons if appropriate.

- These policies also sets out how you can make a complaint about a breach of the APPs and how the 11. complaint will be handled.
- The College will obtain your consent prior to including photographs or videos or other identifying material of you in our promotional material or otherwise making this material available to the public, such as on the internet.
- If you provide the College with the personal information of others, such as other family members, 13. doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the College and why, that they can request access to and correction of that information if they wish and to also refer them to the EREA Privacy Policy for further details about such requests and how the College otherwise handles personal information it collects and complaints it receives.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025

### **Enrolment Collection Notice**

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- 2. The College collects personal information, including sensitive information about students and parents or guardians and family members before and during the course of a student's enrolment at the College. This may be in writing, through technology systems or in the course of conversations and may be direct from the individual or from another source. The primary purpose of collecting this information is to enable the College, Catholic Education Offices and the Catholic Education Commission of Victoria Ltd (CECV) to meet its educational, administrative and duty of care responsibilities to the student to enable them to take part in all the activities of the College.
- 3. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care.
- 4. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
- 5. Health information about students (which includes information about any disability as defined by the Disability Discrimination Act 1992) is sensitive information within the terms of the Australian Privacy Principles (APPs) under the Privacy Act 1988. The College may require medical reports about students from time to time and may otherwise collect sensitive information about students and their families.
- 6. If any personal information requested by the College is not provided, this may affect the College's ability to enrol a student, respond to enquiries, provide the student with educational and support services or allow a person to visit the College.
- 7. The College may disclose personal and sensitive information for administrative, educational and support purposes (or may permit the information to be directly collected by third parties). This may include to:
  - a. College service providers such as the CECV, Catholic Education Offices, school governing bodies and other dioceses.
  - b. Third party service providers that provide online educational and assessment support services, document and data management services, training and support services, hosting services, and software-as-a-services applications.
  - c. CECV and Catholic Education Offices to discharge its responsibilities under the Australian Education Regulation 2013 (Regulation) and the Australian Education Act 2013 (Cth) (AE Act) relating to students with a disability, including ongoing evaluation of funding adequacy for individual students.
  - d. CECV to support the training of selected staff in the use of Colleges' systems.
  - e. Another school to facilitate the transfer of a student.
  - f. Federal and State government departments and agencies acting on behalf of the government e.g. for audit purposes.
  - g. Health service providers, and people providing educational support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools.
  - h. Assessment and educational authorities, including the Australian Curriculum, Assessment and Reporting Authority.
  - i. People providing administrative and financial services to the College.
  - j. Anyone you authorise the College to disclose information to.
  - k. Anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
- 8. The College is required by the Federal Australian Education Regulation (2013) and Australian Education Act 2013 (Cth) (AE Act) to collect and disclose certain information under the Nationally Consistent Collection of Data (NCCD) on students with a disability. The College provides the required information at an individual student level to the Catholic Education Offices and the CECV, as an approved authority. Approved authorities must comply with reporting, record keeping and data quality assurance obligations under the NCCD. Student information provided to the federal government for the purpose of the NCCD does not explicitly identify any student.
- 9. Personal information collected from students is regularly disclosed to their parents or guardians.
- 10. If you make an enrolment application to another College, personal information including health information provided during the application stage may be collected from, or shared with, the other school.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0

- The College may use online or 'cloud' service providers to store personal information and to provide 11. services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's server which may be situated outside Australia. Further information about the College's use of an online or 'cloud' service providers is contained in the College's Privacy Policy.
- The College's Privacy Policy, accessible on the College's website, sets out how parents or students may seek access to and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, where access may result in a breach of the College's duty of care to the student, where students have provided information in confidence or where the College is otherwise required or authorised by law to refuse access. Any refusal will be notified in writing with reasons (unless, given the grounds for refusal, it would be unreasonable to provide reasons).
- The College makes reasonable efforts to be satisfied about the protection of any personal 13. information that may be collected, processed and stored outside Australia in connection with any cloud and third party services and will endeavour to ensure it will be located in countries with substantially similar protections as the APPs.
- Where personal, including sensitive information is held by a cloud computing service provider on behalf of CECV for educational and administrative purposes, it may be stored on servers located within or outside Australia.
- 15 College personnel and the College's service providers, and the CECV and its service providers, may have the ability to access, monitor, use or disclose emails, communications (e.g. instant messaging), documents and associated administrative data for the purposes of administering the ICON system and ensuring its proper use.
- 16. The College may disclose limited personal information to the school parish to facilitate religious and sacramental programs, and other activities such as fundraising.
- 17. The College's Privacy Policy also sets out how parents and students can make a complaint if they believe there has been a breach of the APPs and how the complaint will be handled.
- The College may engage in fundraising activities. Information received from you may be used to make an appeal to you. [It may also be disclosed to organisations that assist in the College's fundraising activities solely for that purpose.] We will not disclose your personal information to third parties for their own marketing purposes without your consent.
- 19. On occasions information such as academic and sporting achievements, student activities and similar news is published in College newsletters and magazines, on our intranet [and on our website]. This may include photographs and videos of student activities such as sporting events, school camps and school excursions. The College will obtain permissions from the student's parent or guardian (and from the student if appropriate) prior to publication to enable the College to include such photographs or videos [or other identifying material] in our promotional material or otherwise make this material available to the public such as on the internet. The College may obtain permissions annually, or as part of the enrolment process. Permissions obtained at enrolment may apply for the duration of the student's enrolment at the College unless the College is notified otherwise. Annually, the College will remind parents and guardians to notify the College if they wish to vary the permissions previously provided.
- If you provide the College with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the College and why.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025

### Collection Notice: Volunteers and Contractors

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- St Joseph's College collects personal information, including sensitive information about contractors and volunteers before and during the course of their engagement with the College. This may be in writing or in the course of conversations. The primary purpose of collecting this information is to enable the College to potentially engage your services and facilitate and administer your involvement with the College.
- Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care to enrolled students.
- Laws governing or relating to the operation of a College require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
- In order to consider your suitability as a contractor/volunteer and to facilitate and manage your relationship with College, you consent to our collecting personal information about you from recruitment agencies, law enforcement agencies for criminal checks and working with children checks, educational institutions to verify your qualifications, and other individuals or businesses we contact for the purpose of reference-checking as agreed with you.
- The personal information we collect about you will be stored securely in a recruitment record. If you become a volunteer/contractor then an appropriate record will be created and the personal information we have collected about you will be stored in this file. We will hold this information for the agreed period of the contract or duration of the volunteer work.
- If after the recruitment process you are not engaged as a volunteer/contractor by the College the information stored in your recruitment record will be stored for 12 months unless you advise us to destroy it at an earlier time.
- After the completion of your volunteer work or contracted period, or after 5 years have elapsed from the date the College decided not to engage you as a volunteer, contractor, the College will take reasonable steps to destroy or deidentify your personal information.
- The College may disclose personal and sensitive information for administrative, educational and support purposes (or may permit the information to be directly collected by third parties). This may include to:
  - a. government departments;
  - b. third party service providers that provide online educational and assessment support services or applications (apps), which may include email and instant messaging;
  - medical practitioners, and people providing educational support and health services to the College, including specialist visiting teachers, sports coaches, volunteers, counsellors and providers of learning and assessment tools;
  - d. people providing administrative and financial services to the College;
  - e. anyone you authorise the College to disclose information to; and
  - anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
- Failure to provide this information will present an unacceptable risk to the College and we may not proceed with our relationship with you.
- The College may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia. The College's and EREA's Privacy Policy contains further information about its use of cloud and other third-party service providers and any of their overseas locations.
- The EREA Privacy Policy and the College's Privacy Policy is accessible via the College website or from the College office. The policy sets out how volunteers and contractors may seek access to, and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others, or may result in a breach of the College's duty of care obligations. Any refusal will be notified in writing with reasons if appropriate.
- These policies also sets out how volunteers and contractors can make a complaint about a breach of the APPs and how the complaint will be handled.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025

- 26. The College will obtain your consent prior to including photographs or videos or other identifying material of you in our promotional material or otherwise making this material available to the public, such as on the internet.
- 27. The College will obtain your consent prior to including your personal information on class lists or College directories.
- 28. If you provide the College with the personal information of others, such as other family members, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the College and why, that they can request access to and correction of that information if they wish and to also refer them to the EREA Privacy Policy for further details about such requests and how the College otherwise handles personal information it collects and complaints it receives.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0

# **Collection Notice: Job Applicants**

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- 1. St Joseph's College collects personal information, including sensitive information about job applicants. This includes information provided in your job application, in the course of conversation or as collected from third parties on your behalf, such as employment referees. The primary purpose of collecting this information is to enable the College to consider your application for employment with the College.
- 2. Some of the information the College collects is to satisfy the College's legal obligations, particularly to enable the College to discharge its duty of care to enrolled students.
- 3. Laws governing or relating to the operation of a school require certain information to be collected and disclosed. These include relevant Education Acts and Public Health and Child Protection laws.
- 4. In order to consider your application for employment and to facilitate and manage your employment relationship with the College, you consent to our collecting personal information about you from recruitment agencies, law enforcement agencies for criminal checks and working with children checks, educational institutions to verify your qualifications, and other individuals or businesses we contact for the purpose of reference-checking as agreed with you.
- 5. The personal information that is collected about you will be stored securely in a recruitment record. If you are successful and become an employee then an employee record will be created and the personal information we have collected will be stored in this file. Employee records are exempt from the Australian Privacy Principles (APPs) under the Privacy Act 1988.
- 6. If you are not offered a position or if you decline an offer of a position at the College the information stored in your recruitment record will be stored for 12 months, unless you advise us to destroy the records at an earlier time. At this time, the College will take reasonable steps to destroy or de-identify the information as appropriate.
- 7. The College may disclose personal and sensitive information for administrative, educational and support purposes (or may permit the information to be directly collected by third parties). This may include to:
  - a. government departments;
  - b. people providing administrative and financial services to the College;
  - c. anyone you authorise the College to disclose information to; and
  - d. anyone to whom the College is required or authorised to disclose the information to by law, including under child protection laws.
- 8. Failure to provide the information to the College will affect the College's ability to evaluate your application and may result in the recruitment process not proceeding.
- 9. The College may also use cloud computing service providers to store personal information (which may include sensitive information) on their servers in the 'cloud'. These servers may be located in or outside Australia. This may mean that personal information may be stored or processed outside Australia.
- 10. The EREA Privacy Policy and the College's Privacy Policy contains further information about its use of cloud and other third-party service providers.
- 11. The EREA Privacy Policy and the College's Privacy Policy is accessible via the College website or from the College office. The Policy sets out how job applicants and employees may seek access to, and correction of their personal information which the College has collected and holds. However, access may be refused in certain circumstances such as where access would have an unreasonable impact on the privacy of others or may result in a breach of the College's duty of care obligations. Any refusal will be notified in writing with reasons if appropriate.
- 12. The EREA Privacy Policy and the College's Privacy Policy also sets out how job applicants and employees can make a complaint about a breach of the APPs and how the complaint will be handled.
- 15. If you provide the College with the personal information of others, such as other employment referees, doctors or emergency contacts, we encourage you to inform them you are disclosing that information to the College and why, that they can request access to and correction of that information if they wish and to also refer them to The EREA Privacy Policy and the College's Privacy Policy for further detail about such requests and how the College otherwise handles personal information it collects and complaints it receives.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0

# Collection Notice: Alumni and Support Associations

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- The Foundation may collect personal information about you from time to time. The primary purpose of collecting this information is to enable us to inform you about our activities and the activities of St Joseph's College Geelong and to keep alumni and foundation members informed about other members.
- We must have the information referred to above to enable us to continue your membership.
- 3. As you know, from time to time we engage in fundraising activities. The information received from you may be used to make an appeal to you. It may also be used by St Joseph's College to assist in its fundraising activities. If you do not agree to this, please advise us.
- We may publish details about you in our publications, social media accounts and our College website. If you do not agree to this you must advise us.
- The College's Privacy Policy contains details on how you may seek access to and correction of personal information collected about you or how you may complain about a breach of the Australian Privacy Principles (APPs). An access or correction refusal will be notified to you in writing and reasons given if appropriate.
- The College may use online or 'cloud' service providers to store personal information and to provide services to the College that involve the use of personal information, such as services relating to email, instant messaging and education and assessment applications. Some limited personal information may also be provided to these service providers to enable them to authenticate users that access their services. This personal information may reside on a cloud service provider's server which may be situated outside Australia. Further information about the College's use of an online or 'cloud' service providers is contained in the College's Privacy Policy.
- The College may from time to time use the services of third party online service providers (including for the delivery of third party online applications, or Apps relating to email and instant messaging, such as Google's G Suite, including Gmail) which may be accessible by you. Some personal information may be collected and processed or stored by these providers in connection with these services. These online service providers may be located in or outside Australia.
- The College makes reasonable efforts to be satisfied about the security of any personal information that may be collected, processed and stored outside Australia in connection with these third party services and will endeavour to ensure the cloud is located in countries with substantially similar protections as the APPs.
- Where personal, including sensitive, information is held by a cloud service provider on behalf of 9. Catholic Education Commission of Victoria Ltd (CECV) for educational and administrative purposes, this information may be stored on servers located within or outside Australia.
- If you provide us with the personal information of others, we encourage you to inform them that you 10. are disclosing that information to the College and why. Also, that they can request access to and correction of that information if they wish, and to refer them to the College's Privacy Policy for further details about such requests and how the College otherwise handles personal information it collects.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025

### Collection Notice: Website

St Joseph's College is part of Edmund Rice Education Australia (EREA), which is an organisation consisting of schools, entities and offices offering a Catholic education in the tradition of Blessed Edmund Rice.

- The EREA Privacy Policy and the College's Privacy Policy is accessible via the College website or from the College office.
- We will collect and maintain in our database certain personally identifiable information from you only when you provide it to us on a voluntary basis, for example, when you make an inquiry, contact us, subscribe to our newsletter or forums, or establish an email account.
- Your email address will only be used for the purpose for which you have provided it, and it will not be added to a mailing list or used for any other purpose without your consent.
- We will not share any information about you with third parties, except as provided by civil privacy legislation.
- Please be aware that this site does not provide facilities for the secure transmission of information 5. across the Internet.
- When you look at our website please be aware that our Internet Service Provider makes a record of your visit and logs information about it. This is the usual practice for an Internet Service Provider. This information may include but is not limited to:
  - a. Your server address
  - b. Your top level domain name (for example .com, .gov, .au, .uk etc)
  - c. The date and time of your visit to the site
  - d. The pages you accessed and documents downloaded
  - e. The previous site you have visited
  - The type of browser you are using
- The St Joseph's College Website uses Google Analytics. Google Analytics mainly uses first-party cookies to report on visitor (aka. user) interactions on Google Analytics customers' websites. Users may disable cookies or delete any individual cookie. Google Analytics also collects Internet Protocol (IP) addresses to provide and protect the security of the service, and to give website owners a sense of which country, state, or city in the world their users come from (also known as "IP geolocation").
- St Joseph's College will not attempt to identify its website users by their browsing activities. However, in the unlikely event of an investigation, a law enforcement agency or other government agency may exercise its legal authority to inspect the College's Internet Service Provider's logs.
- By using our site, you are consenting to our Privacy Policy. We will review this Privacy Policy periodically, and if we ever change our Privacy Policy, we shall post any changes on this page so that you are always kept informed of the information we collect, how we use it and the circumstances under which we disclose it, if at all. If you have any questions or comments about our Privacy Policy, please contact us.

Controlled Document Page 17 of 17 Policy No: 1.3 Version No: 2.0 Review Date: July 2025